

IN THE U.S. DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES of AMERICA
Plaintiff,

v.

TREVOR SCOTT SPARKS
Defendant.

18-00293-2

MOTION FOR RECONSIDERATION OF DETENTION ORDER

Defendant Trevor Scott Sparks, by and through appointed counsel Joseph W. Vanover, moves this Court to reconsider the Order of Detention Pending Trial. (Doc. 52). In support of this Motion for Reconsideration, the defense states as follows:

PROCEDURAL HISTORY

Mr. Sparks and others were indicted on December 12, 2018 by a superseding Indictment (Doc. 18) which alleged, inter alia, Mr. Sparks engaged in a continuing criminal enterprise (count three), conspired to launder money (count two), possessed firearms in furtherance of crimes of violence and drug trafficking crimes (count four), and possessed firearms following conviction for a felony (count five). The government moved to detain Mr. Sparks. (Doc. 19). Mr. Sparks was arrested on December 18, 2018. The Court took up the Motion to Detain and heard evidence and argument on December 21, 2018. A transcript of the detention hearing was made and certified on October 17, 2019. Regarding Mr. Sparks, the Court found reason to believe that no condition or combination of conditions of release would reasonably assure the appearance of the defendant or the safety of any other person or persons and the community. (Doc. 50). The Court entered an Order of Detention. (Doc. 52). The case is set for trial during the joint criminal jury trial docket commencing August 10, 2020.

GROUND TO RECONSIDER BOND

Mr. Sparks has remained in custody since his arrest on December 18, 2018. He is married and has a young son. Mr. Sparks has been on supervision under a court's authority or under the authority of a criminal justice agency multiple times. Mr. Sparks suffers from seizures and keeping him in custody endangers his health and wellbeing. Mr. Sparks is a long-time resident of this area. If released, Mr. Sparks can find gainful employment.

RELIEF REQUESTED

Mr. Sparks is requesting the Court reconsider the Order of Detention and grant him release on his personal recognizance because he does not have the financial means to post a bond. Mr. Sparks will submit to any conditions that the Court deems just and proper including house arrest with electronic monitoring, random drug and alcohol testing, drug patch application and GPS monitoring.

WHEREFORE, Mr. Sparks moves this Court issue an order directing that he be released on signature bond or in the alternative with a \$10,000 unsecured bond pending trial in this matter for the reasons aforementioned, and for other relief as may be appropriate.

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/s/ Joseph W. Vanover

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Attorney for Trevor Sparks

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the above and foregoing was transmitted to opposing counsel of record via the CM-ECF system on the date electronically stamped on the lower edge of this document.

by: /s/ Joseph W. Vanover
Joseph W. Vanover #48074
Attorney for Trevor Sparks